

**Subject:** Please Expand Orca Critical Habitat

**From:** "Karen Button" <moonmagick@wildmail.com>

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**To:** "orcahabitat.nwr@noaa.gov" <orcahabitat.nwr@noaa.gov>

Dear NOAA,

As an Alaskan resident, I am well aware of the problems various whale populations are now facing. Specifically, our Cook Inlet beluga population is in real trouble, and resident orca populations in Prince William Sound are also struggling.

Environmental laws that exclude or are lax with the Department of Defense is one of the reasons for the beluga situation in Cook Inlet. I personally worked on a report reviewing issues related to Superfund cleanup at Elmendorf Air Force Base. In so doing, I had access to reports by military biologists that directly contravened what the military was saying publicly about belugas...that there were no belugas in the Eagle River Estuary where they have target practice. This was flatly untrue.

NOAA must take a pro-active position, especially where the military is concerned. The public has no recourse in some of these sectors, but NOAA does.

I spend a good deal of time in the Puget Sound area and am aware of the amount of organizing effort local communities are putting into protecting the Sound and helping it to recover. Orcas, as other whales, are especially sensitive to noise. I encourage you to implement the proposals made by People for Puget Sound, which is included below.

All Puget Sound waters need to be designated as critical habitat for the recovery of Southern resident orcas. Specifically:

- 2) The exclusion of nearshore waters shallower than 20 feet makes no sense.
- 3) The proposed military exclusions are too large, and apply to all activities, not just the military.
- 4) Noise levels need to be included as "Essential Features" for orcas' critical habitat
- 5) Hood Canal needs to be included as critical habitat for orcas.
- 6) Areas of the Pacific Coast should be included in the critical habitat - especially the Olympic National Marine Sanctuary.

Sincerely

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